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1999 JAN 10 10 2 05



Beth E. Levine  
Corporate Counsel

December 30, 1999

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00016683

Reference: July Monthly Report (6/1/99 - 6/30/99)

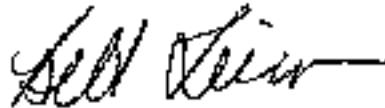
Dear Mr. Ciaraldi:

We are in receipt of your letter dated December 15, 1999 to Alan G. Levin, Treasurer, Pfizer Inc. PAC. With respect to the above-referenced matter, and in reference as well to similar issues with the November Monthly Report (10/1/99 - 10/31/99) please be advised that the receipts from Pfizer PAC-State itemized on Schedule A, line 12 were *refunds* of an earlier transfer made by Pfizer PAC to Pfizer PAC-State. They were not transfers from Pfizer PAC's non-Federal account to its Federal account.

More specifically, Pfizer PAC (Pfizer PAC's Federal account) funds are used exclusively to finance non-Federal activities through Pfizer PAC-State. This is accomplished by transferring funds from Pfizer PAC to Pfizer PAC-State (including Pfizer PAC-NY) as needed for making State or local contributions. In each of the instances cited in your letters, Pfizer PAC-State elected not to use the funds to make the contributions and refunded the transferred funds to Pfizer PAC Federal. Thus, all of the funds refunded to Pfizer PAC were derived from permissible funds and, indeed, consist solely of funds that came from Pfizer PAC in the first place.

Accordingly, we do not at this time intend to modify the July or November Monthly Reports. If you have any further questions about this matter, please don't hesitate to call me.

Very truly yours,


A handwritten signature in cursive script, appearing to read "Beth Levine", followed by a horizontal line.

Beth F. Levine

## Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

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